



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAR 16 2005

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OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Dear Dr. Deyo:

Thank you for your letter and attachments dated February 18, 2005 to the Administrator of the U. S. Environmental Protection Agency (EPA) regarding EPA's High Production Volume (HPV) Challenge Program and the Interagency Testing Committee's 55<sup>th</sup> Report.

Your letter requests that isopropyl formate (CAS No. 625-55-8) and propanol, 3-hydroxy-2,2-dimethyl- (commonly called hydroxypivaldehyde) (CAS No. 597-31-9) be removed from the HPV list of orphans noted by EPA and included in the Interagency Testing Committee's 55<sup>th</sup> Report. It further requests that these chemicals be removed from those subject to the HPV Challenge Program, stating that they are no longer HPV.

As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) in March 1999. Among the prerequisites to be considered for removing a chemical from the HPV Challenge Program is that the chemical does not meet Inventory Update Rule (IUR) reporting requirements for the two most recent reporting years, in this case 1998 and 2002. Based on our review of pertinent IUR reporting data for these years, EPA has determined that isopropyl formate (CAS No. 625-55-8) and propanol, 3-hydroxy-2,2-dimethyl- (CAS No. 597-31-9) **do meet** the no longer HPV criteria. The HPV Challenge Program Chemical List will be annotated by designating these chemicals with a "5" to indicate that they are no longer HPV. Additionally, we will request that these chemicals be removed from the EPA's list of orphans and the Interagency Testing Committee's 55<sup>th</sup> Report.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-8176. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via email at [tsc hotline@epa.gov](mailto:tsc hotline@epa.gov).

Sincerely

Jim V. ..., Director  
Chemical Control Division

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